

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

JILL BALLARD, REBECCA VARNO,
and MARK POKORNI on behalf of
themselves and the class members
described herein,

Plaintiffs,

v.

NAVIANT CORPORATION,
NAVIANT SOLUTIONS, INC., AND
NAVIANT SOLUTIONS, LLC,

Defendants.

Civil No. 3:18-cv-00121-MEM-
DFB

**DEFENDANTS' UNOPPOSED MOTION TO
ENLARGE DEFENDANTS' TIME TO RESPOND
TO PLAINTIFFS' THIRD AMENDED COMPLAINT**

Defendants Navient Corporation (“Navient Corp.”) and Navient Solutions, LLC, formerly known as Navient Solutions, Inc. (“NSL” and collectively “Defendants”), respectfully move this Court for an Order enlarging the time to respond to Plaintiffs’ Third Amended Complaint [“the Complaint” Doc. 118-3]. In support of their position, Defendants state as follows:

1. On December 19, 2024, the Court granted Plaintiffs’ Motion for Leave to file a Third Amended Complaint [Doc. 118], attached to the motion as Exhibit B, [Doc. 118-3] and deemed the Complaint filed [Doc. 136].
2. Accordingly, Defendants’ current deadline to file a response to the Complaint is January 2, 2025.

3. Defendants respectfully request an extension of the response deadline by two (2) weeks to January 16, 2025.

4. The requested extension is not intended to cause delay, but rather is necessary to accommodate the holidays and allow defense counsel additional time to review the allegations and prepare a response.

5. Pursuant to Local Rule 7.1, on January 1, 2025, counsel for Defendants contacted counsel for Plaintiffs, Anthony Fiorentino, Esq., via email, and Plaintiffs' counsel confirmed that they do not object to the proposed extension.

WHEREFORE, Defendants respectfully request that the Court enlarge the time to respond to Plaintiffs' Third Amended Complaint to January 16, 2025.

Respectfully submitted,

NAVIENT SOLUTIONS, LLC AND
NAVIENT CORPORATION

Dated: January 2, 2025

BY: /s/ Jonathan Marmo
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Plaintiffs,

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Defendants.

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[PROPOSED] ORDER

AND NOW, this _____ day of _____ 2025, following Defendants' Unopposed Motion to Enlarge Time to Respond to Plaintiffs' Third Amended Complaint, IT IS HEREBY ORDERED THAT:

1. Defendants shall file their response in to the Third Amended Complaint no later than January 16, 2025.

The Honorable Darryl F. Bloom